## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

PRINCETON DIGITAL IMAGE CORPORATION,

Plaintiff,

C.A. No. 12-1461 (LPS) (CJB)

v.

KONAMI DIGITAL ENTERTAINMENT INC, HARMONIX MUSIC SYSTEMS, INC. and ELECTRONIC ARTS, INC.,

Defendants.

## JOINT MOTION TO STAY CASE DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Princeton Digital Image Corporation ("PDI") and defendants Harmonix Music Systems, Inc. ("Harmonix") and Electronic Arts, Inc. ("EA") hereby jointly move to stay all case deadlines with respect to PDI and Harmonix/EA in Case No. 12-1461 (LPS) (CJB) for thirty (30) days, up to and including September 4, 2018.

Plaintiff PDI and defendants Harmonix/EA have resolved the disputed issues between them. As a result, PDI and Harmonix/EA respectfully request a stay of all proceedings as between PDI and Harmonix/EA, during which time the parties will prepare proposed Orders of dismissal and submit them to the Court.

No party will be prejudiced by the requested stay, and this request is not made for purposes of delay or for any other improper purpose. All deadlines as to PDI's claims against defendant Konami Digital Entertainment, Inc. ("Konami") in this case, and all deadlines as to PDI's claims against defendant Ubisoft, Inc. ("Ubisoft") in co-pending Case No. 13-0335 (LPS) (CJB), would remain unchanged.

Therefore, plaintiff PDI and defendants Harmonix/EA respectfully request that the Court enter an Order staying all deadlines between PDI and Harmonix/EA up to and including September 4, 2018. A proposed Order is attached hereto.

## O'KELLY ERNST & JOYCE, LLC

## /s/ Rodger D. Smith II

Sean T. O'Kelly (#4349) Daniel P. Murray (#5785) 901 North Market Street Suite 1000 Wilmington, DE 19801 (302) 778-4000

/s/ Daniel P. Murray

sokelly@oelegal.com dmurray@oelegal.com

Attorneys for Plaintiff
Princeton Digital Image Corporation

Dated: August 3, 2018

Jack B. Blumenfeld (#1014) Rodger D. Smith II (#3778) Jeremy A. Tigan (#5239) 1201 North Market Street P.O. Box 1347 Wilmington, DE 19899-1347 (302) 658-9200 jblumenfeld@mnat.com rsmith@mnat.com jtigan@mnat.com

Attorneys for Defendants Harmonix Music Systems, Inc. and Electronic Arts, Inc.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP